

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	5:25-cv-00462-G
	)	
PLAZA HOTELS, LLC;	)	
STEVE KETTER;	)	
MICHAEL WILEY;	)	
OKC AIRPORT ES, LLC;	)	
ESH STRATEGIES FRANCHISE, LLC;	)	
KAJAL HOSPITALITY, LLC;	)	
JALIYAN HOSPITALITY, INC.;	)	
SUPER 8 WORLDWIDE, INC.;	)	
CHAND & SAAJ HOSPITALITY, INC.;	)	
RAMADA WORLDWIDE, INC.;	)	
YASH ENTERPRISES, INC.;	)	
HOWARD JOHNSON;	)	
INTERNATIONAL, INC.;	)	
NOOR HOTEL, LLC;	)	
AMBICA, LLC;	)	
OM, LLC;	)	
INDRA, LLC; and	)	
G6 HOSPITALITY FRANCHISING, LLC,	)	
	)	
Defendants.	)	

**DISCLOSURE STATEMENT IDENTIFYING CONSTITUENTS OF LLC**

COME NOW, the Defendant, Chand & Saaj Hospitality, LLC<sup>1</sup>, pursuant to LCvR 7.1.1, and submits its *Disclosure Statement Identifying Constituents of LLC* contemporaneously with its first filing. This matter is before the Court upon federal question subject matter jurisdiction. The following are members of Chand & Saaj Hospitality, LLC: Vimi H. Patel, Tushar Natha, Amrut Patel, Rajesh Jivan, Suman V.

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<sup>1</sup> Chand and Saaj, LLC is improperly named as Chand and Saaj, Inc. in the Complaint.

Patel, Ramesh V. Patel, Rajendra V. Patel, Manish S. Patel, Paresh S. Patel, Bhupendra S. Patel, Rashmin R. Natha, Kusum S. Patel, Alka M. Patel, and Sharda R. Patel.

Respectfully submitted,

SECREST, HILL, BUTLER & SECREST

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**CERTIFICATE OF MAILING**

This is to certify that on the 27<sup>th</sup> day of May, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF Registrants:

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*s/James K. Secrest, III*